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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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*In re:*

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**FORTY-FIRST MONTHLY FEE STATEMENT OF GILBERT LLP,  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC  
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION  
CLAIMANTS FOR THE PERIOD FEBRUARY 1, 2023 THROUGH FEBRUARY 28, 2023**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant:</b>	<b>Gilbert LLP</b>
<b>Authorized to provide professional services to:</b>	<b>Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants</b>
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	<b>December 2, 2019 (Docket #553)</b>
<b>Period for which compensation and reimbursement is sought:</b>	<b>February 1, 2023 through February 28, 2023</b>
<b>Amount of compensation sought as actual, reasonable, and necessary:</b>	<b>\$338,307.00 (80% of \$422,883.75)</b>
<b>Amount of expense reimbursement sought as actual, reasonable and necessary:</b>	<b>\$28,834.25 (100%)</b>
<b>This is a:</b>	<b>Monthly Fee Statement</b>

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this forty-first monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing February 1, 2023 through February 28, 2023 (the “**Application Period**”).

#### **Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$422,883.75 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$28,834.25.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$999.38. The blended hourly rate of paraprofessionals during the Application Period is \$322.30.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$6,254.75 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$6,254.75.

4. Annexed hereto as **Exhibit D** is the summary of reasonable and necessary expenses incurred by Gilbert LLP for retained consulting experts, which have not yet been paid. Pursuant to the retention agreements applicable to these consulting experts, Gilbert LLP is not obligated to actually pay the incurred amounts until those expenses have been approved pursuant to the process mandated by the Procedures Order. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks payment for 100% of such expenses, totaling \$22,579.50. Upon receipt, Gilbert LLP will promptly pay the accrued expenses that are approved.

5. Annexed hereto as **Exhibit E** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

**FILING AND SERVICE**

6. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

7. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

8. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

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WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$338,307.00 (80% of \$422,883.75) and reimbursement of reasonable and necessary expenses incurred in the amount of \$28,834.25 (100%), for a total amount of \$367,141.25 for the Application Period.

Dated: April 5, 2023  
Washington, DC

Respectfully submitted,

**GILBERT LLP**

/s/ Kami E. Quinn

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*Counsel for the Ad Hoc Committee of  
Governmental and Other Contingent  
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**Exhibit A**

**Summary of Services by Category**

**SUMMARY OF SERVICES BY PROJECT CATEGORY**

<b>Project Code</b>	<b>Project Category</b>	<b>Hours Billed in Period</b>	<b>Fees for Period</b>
A004	Case Administration	4.6	\$1,035.00
A009	Meetings / Communications with AHC	3.5	\$6,825.00
A015	Non-Working Travel (Billed @ 50%)	2.1	\$761.25
A020	Insurance Adversary Proceeding	485.1	\$414,262.50
		<b>495.3</b>	<b>\$422,883.75</b>

**Exhibit B**

**Summary of Compensation by Professional**



<b>Name of Professional</b>	<b>Position / Year Admitted Practice</b>	<b>Hourly Billing Rate</b>	<b>Hours Billed for Period</b>	<b>Total Fees for Period</b>
Scott D. Gilbert	Special Counsel / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims – 2019	\$1,950	3.5	\$6,825.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,600	34.1	\$54,560.00
Richard Leveridge	Partner / State of New York – 1997 District of Columbia – 1981 U.S. Court of Appeals for the District of Columbia – 1981 U.S. District Court for the District of Columbia – 1982 U.S. Supreme Court - 1986 U.S. Court of Appeals for the Fourth Circuit - 1988 U.S. District Court for the E. D. of New York – 1988 U.S. District Court for the S. D. of New York - 1998 U.S. District Court for the District of Maryland – 2000 U.S. Court of Appeals for the Second Circuit - 2020	\$1,600	59.0	\$94,400.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$1,000	68.8	\$68,800.00
Jon Dougherty	Of Counsel / State of New York – 2014 U.S. District Court for the S. D. of New York – 2014 District of Columbia – 2016 U.S. District Court for District of Wisconsin – 2017 U.S. Bankruptcy Court for the S. D. of New York – 2022	\$825	60.3	\$49,747.50
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia – 2017	\$825	21.6	\$17,820.00
Adam Farra	Associate / State of Maryland – 2011 U.S. District Court for the District of Maryland – 2013 District of Columbia – 2015 U.S. Court of Appeals for the Second Circuit - 2017	\$775	7.6	\$5,890.00
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$725	45.4	\$32,915.00

<b>Name of Professional</b>	<b>Position / Year Admitted Practice</b>	<b>Hourly Billing Rate</b>	<b>Hours Billed for Period</b>	<b>Total Fees for Period</b>
Alison Gaske	Associate / District of Columbia – 2016	\$725 \$352.50 <sup>2</sup>	57.4 2.1	\$41,615.00 761.25
December Huddleston	Associate / District of Columbia – 2021	\$525	29.0	\$15,225.00
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$500	20.0	\$10,000.00
Sherley Martinez	Paralegal – Joined firm in 2017	\$350	14.1	\$4,935.00
Nick Poz	Paralegal – Joined firm in 2022	\$350	20.8	\$7,280.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$265	12.5	\$3,312.50
Carmen Turner	Junior Paralegal – Joined firm in 2021	\$225	39.1	\$8,797.50
	<b>Totals</b>		<b>495.3</b>	<b>\$422,883.75</b>
	<b>Attorney Blended Rate</b>	<b>\$999.38</b>		
	<b>Paraprofessional Blended Rate</b>	<b>\$322.30</b>		

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<sup>2</sup> Non-working travel is billed @ 50% of regular hourly rates.

**Exhibit C**

**Summary of Expenses Incurred**

**SUMMARY OF EXPENSES INCURRED**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Contracted Professional Fees – Litigation Support Vendors	\$1,773.50
Depositions / Transcripts	\$2,591.25
Travel – Lodging	\$1,000.00
Travel – Meals	\$250.00
Travel – Train Fare	\$640.00
<b>Total</b>	<b>\$6,254.75</b>

**Exhibit D**

**Summary of Expenses Incurred and Not Yet Paid**

**SUMMARY OF EXPENSES INCURRED BUT NOT YET PAID**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Insurance Consulting Expert A	\$22,579.50
<b>Total</b>	<b>\$22,579.50</b>

**Exhibit E**

**Time and Expense Detail**

**GILBERT** LLP

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Ad Hoc Committee  
c/o Marshall S. Huebner  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017

March 27, 2023  
Invoice Number: 11329702  
Client Number: 1599  
Tax ID: 52-2283869

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**FOR PROFESSIONAL SERVICES RENDERED through February 28, 2023**

**Re: Ad Hoc Committee (Purdue)**

<b>Matter Description</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
Purdue Bankruptcy	422,883.75	6,254.75	429,138.50
<b>Total</b>	<b>422,883.75</b>	<b>6,254.75</b>	<b>429,138.50</b>

TOTAL FEES \$ 422,883.75

TOTAL EXPENSES \$ 6,254.75

**TOTAL FEES AND EXPENSES \$ 429,138.50**



**FOR PROFESSIONAL SERVICES RENDERED through February 28, 2023**

**Purdue Bankruptcy**

**A004: Case Administration**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Turner, C.	2/01/23	Review court docket for pleadings recently filed in case.	.90	202.50
Turner, C.	2/06/23	Review court docket for recently-filed pleadings.	.90	202.50
Turner, C.	2/13/23	Review court docket for recently-filed pleadings.	1.80	405.00
Turner, C.	2/22/23	Review court docket for pleadings recently filed in case.	1.00	225.00
<b>Project Total:</b>			<b>4.60</b>	<b>\$ 1,035.00</b>

**A009: Meetings / Communications with AHC**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	2/08/23	Confer with AHC and Fifteen re strategy.	1.50	2,925.00
Gilbert, S.	2/14/23	Confer with AHC re strategy.	1.00	1,950.00
Gilbert, S.	2/21/23	Confer with AHC re strategy.	.50	975.00
Gilbert, S.	2/28/23	Confer with AHC re strategy.	.50	975.00
<b>Project Total:</b>			<b>3.50</b>	<b>\$ 6,825.00</b>

**A015: Non-Working Travel (Billed @ 50%)**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gaske, A.	2/28/23	Travel from Washington, DC to New York, NY.	2.10	761.25
<b>Project Total:</b>			<b>2.10</b>	<b>\$ 761.25</b>

**A020: Insurance Adversary Proceeding**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Shore, R.	2/01/23	Confer with R. Leveridge re legal research and other litigation issues.	.90	1,440.00
Shore, R.	2/01/23	Review Liberty proposed policy stipulation (0.3); review correspondence re Issue #45 (0.3); review deposition outline for Deponent #18 (0.3).	.90	1,440.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	2/01/23	Communicate with co-counsel re Navigators' discovery issues (0.8); communicate with S. Sraders re Insurers #5 and #36 privilege logs (0.2); review additional edits to Deponent #14 outline (0.8); revise correspondence with co-counsel re potential retention of expert (0.3); continue review of Deponent #19 materials in preparation for deposition (1.8).	3.90	3,900.00
Rush, M.	2/01/23	Communicate with Reed Smith and J. Rubinstein re correspondence with Navigators' counsel.	.90	742.50
Rush, M.	2/01/23	Review Issue #14.	.40	330.00
Gaske, A.	2/01/23	Communicate with co-plaintiffs re Liberty policy stipulation.	.70	507.50
Gaske, A.	2/01/23	Research re Issue #45.	2.00	1,450.00
Leveridge, R.	2/01/23	Continue reviewing and commenting on deposition outline of Deponent #18.	1.90	3,040.00
Leveridge, R.	2/01/23	Confer with R. Shore re issues relating to legal research and other projects in litigation and strategic issues.	.90	1,440.00
Leveridge, R.	2/01/23	Communicate with J. Rubinstein and S. Sraders re insurer privilege log issue (0.2); communicate with J. Rubinstein and S. Sraders re deposition strategy question (0.3).	.50	800.00
Leveridge, R.	2/01/23	Draft communication to co-counsel re proposed retention of certain expert.	1.10	1,760.00
Ogrey, S.	2/01/23	Review and organize Liberty policies re policy stipulation.	5.10	1,351.50
Farra, A.	2/01/23	Draft responses re contention interrogatories.	6.10	4,727.50
Sraders, S.	2/01/23	Revise draft deposition outline for Deponent #18.	2.80	2,030.00
Sraders, S.	2/01/23	Analyze privilege log for Insurer #36.	.70	507.50
Sraders, S.	2/01/23	Correspond with A. Crawford re privilege log for Insurer #36.	.20	145.00
Hubbard, B.	2/01/23	Review draft correspondence re expert retention.	.60	300.00
Huddleston, D.	2/01/23	Summarize deposition transcript of Deponent #14.	1.90	997.50
Dougherty, J.	2/01/23	Continue review of recent legal ruling (2.1); revise legal memorandum tracking significant decisions in case re same (1.1).	3.20	2,640.00
Shore, R.	2/02/23	Confer with J. Rubinstein re strategy.	.40	640.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	2/02/23	Communicate with M. Rush re Navigators' deposition preparation (0.3); review UCC and Debtors' comments to draft Rule 30(b)(6) letter (0.9); review insurer acknowledgments re M. Leopold claim (0.2); confer with R. Leveridge and A. Gaske re Issue #45 (0.8); confer with R. Shore re strategy (0.4); review discovery strategy (0.6); correspond with team re Consulting Expert A analysis (0.3).	3.50	3,500.00
Rush, M.	2/02/23	Revise memorandum re Issue #14.	1.90	1,567.50
Rush, M.	2/02/23	Revise letter to insurers re Rule 30(b)(6) depositions.	2.20	1,815.00
Gaske, A.	2/02/23	Continue research re Issue #45.	3.60	2,610.00
Gaske, A.	2/02/23	Review co-plaintiff counsels' comments to letter re Rule 30(b)(6) topics.	.10	72.50
Gaske, A.	2/02/23	Confer with R. Leveridge and J. Rubinstein re Issue #45.	.80	580.00
Leveridge, R.	2/02/23	Review status of legal research re Issue #45.	.60	960.00
Leveridge, R.	2/02/23	Confer with J. Rubinstein and A. Gaske re Issue #45 legal research issues.	.80	1,280.00
Leveridge, R.	2/02/23	Communicate with Consulting Expert A re analytical work being performed (0.4); review same (1.3).	1.70	2,720.00
Leveridge, R.	2/02/23	Review comments from co-counsel, J. Rubinstein and M. Rush re Rule 30(b)(6) letter.	.80	1,280.00
Leveridge, R.	2/02/23	Communicate with M. Rush re legal analysis of cases pertaining to Issue #14.	.40	640.00
Ogrey, S.	2/02/23	Continue review of Liberty policies and documents re policy stipulations.	3.40	901.00
Sraders, S.	2/02/23	Communicate with S. Martinez re deposition of Deponent #18.	.20	145.00
Sraders, S.	2/02/23	Review proposed edits to draft Rule 30(b)(6) letter.	.20	145.00
Turner, C.	2/02/23	Review and organize materials from Navigators and Liberty.	.70	157.50
Hubbard, B.	2/02/23	Review underlying claim documents.	2.50	1,250.00
Huddleston, D.	2/02/23	Continue summarizing deposition transcript of Deponent #14.	3.80	1,995.00
Poz, N.	2/02/23	Continue organizing case materials re Issue #45.	.80	280.00
Dougherty, J.	2/02/23	Continue revising legal memorandum tracking issues in adversary proceeding to incorporate recent decision.	3.30	2,722.50
Shore, R.	2/03/23	Review correspondence re discovery and policy stipulation (0.3); analyze recent opioid-related decision (1.6).	1.90	3,040.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	2/03/23	Revise analysis of opioid coverage opinion (0.6); review insurer correspondence re notice of underlying claim (0.2); review insurer correspondence re proposed policy stipulation with Aspen/SRCS (0.3); communicate with co-counsel re discovery correspondence (0.2); continue review of materials in preparation for deposition of Deponent #19 (3.3); analysis re drafting history of policies (0.4); communicate with team re potential expert (0.2); communicate with team re Consulting Expert A analysis (0.2).	5.40	5,400.00
Martinez, S.	2/03/23	Review documents re underlying claims.	1.50	525.00
Martinez, S.	2/03/23	Review and organize materials for upcoming deposition of Deponent #18.	.50	175.00
Gaske, A.	2/03/23	Analyze additional SRCS Elite policy pages re policy stipulation.	.80	580.00
Gaske, A.	2/03/23	Review information on policies for provision re Issue #62.	.40	290.00
Leveridge, R.	2/03/23	Review memorandum analyzing recent legal decision.	.80	1,280.00
Leveridge, R.	2/03/23	Review proposal for work from potential expert.	.70	1,120.00
Leveridge, R.	2/03/23	Communicate with counsel for potential expert re retention.	.30	480.00
Leveridge, R.	2/03/23	Review materials re Deponent #18 deposition.	.90	1,440.00
Sraders, S.	2/03/23	Analyze proposal from potential expert.	1.00	725.00
Turner, C.	2/03/23	Review and organize underlying complaints.	5.10	1,147.50
Turner, C.	2/03/23	Review and organize Travelers' claims.	.30	67.50
Hubbard, B.	2/03/23	Review analysis of underlying complaints.	2.70	1,350.00
Dougherty, J.	2/03/23	Review revisions to draft memorandum analyzing recent legal decision (0.5); communicate with R. Shore and R. Leveridge re same (0.3); review recent case law re issues in adversary proceeding (4.1).	4.90	4,042.50
Sraders, S.	2/05/23	Review deposition outline for Deponent #18.	.20	145.00
Shore, R.	2/06/23	Confer with J. Rubinstein and R. Leveridge re Issue #69 and strategic issues.	1.00	1,600.00
Shore, R.	2/06/23	Review R. Leveridge correspondence re Issue #45 (0.3); analysis re potential expert retention (0.7); analyze next steps re Issue #69 (0.6).	1.60	2,560.00
Rubinstein, J.	2/06/23	Confer with R. Shore and R. Leveridge re Issue #69 and strategic issues (1.0); correspond with co-counsel re policy stipulations, deposition scheduling, discovery correspondence and Consulting Expert A analysis (0.7);	1.70	1,700.00

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Name	Date	Services	Hours	Amount
Rush, M.	2/06/23	Revise letter to insurers re Rule 30(b)(6) depositions.	1.40	1,155.00
Rush, M.	2/06/23	Revise outline for Deponent #16.	2.20	1,815.00
Martinez, S.	2/06/23	Confer with B. Hubbard re claims review project.	.60	210.00
Martinez, S.	2/06/23	Review and organize additional potential exhibits for deposition of Deponent #18.	.30	105.00
Gaske, A.	2/06/23	Correspond with co-counsel re Liberty policy stipulation.	.20	145.00
Gaske, A.	2/06/23	Analyze policy terms in certain policies.	.40	290.00
Leveridge, R.	2/06/23	Communicate with co-counsel re potential expert.	.30	480.00
Leveridge, R.	2/06/23	Review outline and proposed exhibits for Deponent #18 deposition (0.9); review new material provided by S. Sraders (1.2).	2.10	3,360.00
Leveridge, R.	2/06/23	Communicate with Consulting Expert A re extent of analysis for communication to co-counsel (0.2); review communication from J. Rubinstein and B. Hubbard re same (0.3); draft revised communication to co-counsel re review of relevant material (0.4); review response from Consulting Expert A (0.2); revise communication to co-counsel accordingly (0.2) review bankruptcy protective order and relevant order re confidentiality (0.4); communicate with co-counsel re same (0.1).	1.80	2,880.00
Leveridge, R.	2/06/23	Review communication from co-counsel re Issue #69 development (0.1); confer with R. Shore and J. Rubinstein re same (1.0); communicate with co-counsel re follow-up meeting to discuss Issue #69 (0.2).	1.30	2,080.00
Sraders, S.	2/06/23	Review outline and relevant documents to prepare for upcoming deposition of Deponent #18.	4.80	3,480.00
Turner, C.	2/06/23	Review and organize third amended protective order.	.10	22.50
Turner, C.	2/06/23	Continue to review and organize underlying complaints.	2.70	607.50
Hubbard, B.	2/06/23	Review draft correspondence re potential expert in context of information from the expert review.	.70	350.00
Hubbard, B.	2/06/23	Confer with Consulting Expert A re analysis.	.20	100.00
Hubbard, B.	2/06/23	Confer with S. Martinez re complaint review.	.60	300.00
Poz, N.	2/06/23	Revise letter to insurers re Rule 30(b)(6) depositions.	.30	105.00
Dougherty, J.	2/06/23	Continue reviewing recent decisions re relevant issues in adversary proceeding (1.9); revise memorandum tracking such decisions (1.3).	3.20	2,640.00

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Name	Date	Services	Hours	Amount
Shore, R.	2/07/23	Correspond with A. Gaske re settlement with Insurer #12.	.20	320.00
Rubinstein, J.	2/07/23	Continue review of materials in preparation for deposition of Deponent #19 (5.2); correspond with co-counsel re policy stipulations (0.1); correspond with insurer counsel and co-counsel re discovery issues (0.6).	5.90	5,900.00
Rush, M.	2/07/23	Revise outline for Deponent #16.	3.10	2,557.50
Rush, M.	2/07/23	Review letter from counsel for Navigators re discovery issues.	.40	330.00
Martinez, S.	2/07/23	Attend M. Thomas deposition and assist with exhibits.	4.40	1,540.00
Martinez, S.	2/07/23	Review and organize exhibits for deposition of M. Thomas.	.20	70.00
Gaske, A.	2/07/23	Correspond with R. Shore re settlement with Insurer #12.	.20	145.00
Gaske, A.	2/07/23	Correspond with Liberty counsel re policy stipulation.	.40	290.00
Gaske, A.	2/07/23	Review documents in preparation for deposition of Deponent #5.	.70	507.50
Gaske, A.	2/07/23	Review policy issued by Insurer #2.	.70	507.50
Leveridge, R.	2/07/23	Review exhibits in preparation for M. Thomas deposition.	1.50	2,400.00
Leveridge, R.	2/07/23	Attend M. Thomas deposition.	4.40	7,040.00
Leveridge, R.	2/07/23	Review retention of potential expert.	.60	960.00
Leveridge, R.	2/07/23	Review communications from co-counsel and opposing counsel re discovery issues.	.40	640.00
Sraders, S.	2/07/23	Depose M. Thomas.	4.40	3,190.00
Sraders, S.	2/07/23	Confer with R. Leveridge and J. Rubinstein re potential expert.	.20	145.00
Turner, C.	2/07/23	Continue to review and organize underlying complaints.	5.30	1,192.50
Hubbard, B.	2/07/23	Review and summarize Insurer #2 coverage.	1.10	550.00
Hubbard, B.	2/07/23	Review documents found in complaint review.	.80	400.00
Poz, N.	2/07/23	Update tracking re meet-and-confer.	.10	35.00
Poz, N.	2/07/23	Organize materials in preparation for Deponent #16 deposition.	.70	245.00
Poz, N.	2/07/23	Update calendar re Deponent #19 deposition.	.10	35.00
Dougherty, J.	2/07/23	Continue reviewing recent case law re relevant issues in adversary proceeding (2.2); continue revising memorandum analyzing relevant legal issues (1.9).	4.10	3,382.50

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Shore, R.	2/08/23	Confer with A. Gaske re settlement with Insurer #12.	.50	800.00
Rubinstein, J.	2/08/23	Communicate with team re preparation for Deponent #19 deposition (0.1); review correspondence with co-counsel re Deponent #16 deposition (0.2); update litigation task list (0.8); analysis re Issue #69 (0.5); analysis of Consulting Expert A status of work (0.6); confer with Consulting Expert A and R. Leveridge re same (1.4); review discovery letter from Navigators (0.6).	4.20	4,200.00
Gaske, A.	2/08/23	Confer with R. Shore re draft agreement with Insurer #12.	.40	290.00
Gaske, A.	2/08/23	Correspond with co-counsel re SRCS policy stipulation.	.10	72.50
Leveridge, R.	2/08/23	Confer with Consulting Expert A re status of work.	1.40	2,240.00
Sraders, S.	2/08/23	Review memorandum re Issue #52.	.30	217.50
Turner, C.	2/08/23	Continue to review and organize complaints against Debtors.	2.30	517.50
Hubbard, B.	2/08/23	Confer with Consulting Expert A re analysis.	1.40	700.00
Dougherty, J.	2/08/23	Continue analysis of recent rulings re legal issues relevant to adversary proceeding (2.4); revise memorandum re same (1.2).	3.60	2,970.00
Shore, R.	2/09/23	Confer with co-counsel re strategy.	1.00	1,600.00
Shore, R.	2/09/23	Confer with team re litigation status and next steps.	.80	1,280.00
Rubinstein, J.	2/09/23	Confer with M. Rush re multiple discovery issues (0.7); confer with co-counsel re strategy (1.0); confer with team re strategy (0.8); confer with R. Leveridge re multiple issues (0.3); review legal analysis re Issue #45 (0.3); review Consulting Expert A materials (0.3).	3.40	3,400.00
Rush, M.	2/09/23	Review letter from counsel for Insurer #25 re discovery issues.	1.30	1,072.50
Rush, M.	2/09/23	Revise outline for Deponent #16.	1.00	825.00
Rush, M.	2/09/23	Confer with team re case status and strategy.	.80	660.00
Rush, M.	2/09/23	Communicate with team re expert issues.	.10	82.50
Martinez, S.	2/09/23	Review production databases re underlying claims.	.70	245.00
Gaske, A.	2/09/23	Confer with team re strategy and next steps.	.80	580.00
Gaske, A.	2/09/23	Review revised SRCS Elite policy stipulation.	.90	652.50
Gaske, A.	2/09/23	Draft summary of research on Issue #52.	1.40	1,015.00
Leveridge, R.	2/09/23	Communicate with A. Gaske re Issue #45 research.	.70	1,120.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	2/09/23	Review material from Consulting Expert A in preparation for meeting with co-counsel (1.0); communicate with co-counsel re experts and Issue #69 (1.2).	2.20	3,520.00
Leveridge, R.	2/09/23	Review materials re insurance policy drafting history.	.70	1,120.00
Ogrey, S.	2/09/23	Confer with team re case status and strategy.	.80	212.00
Farra, A.	2/09/23	Confer with team re litigation update and strategy.	.80	620.00
Sraders, S.	2/09/23	Confer with team re recent developments and next steps.	.80	580.00
Sraders, S.	2/09/23	Review analysis of Issue #52.	.20	145.00
Turner, C.	2/09/23	Confer with team re litigation strategy and case update.	.80	180.00
Turner, C.	2/09/23	Continue to review and organize underlying complaints.	1.10	247.50
Hubbard, B.	2/09/23	Create review template for additional set of complaint documents.	.90	450.00
Hubbard, B.	2/09/23	Confer with team re status and strategy.	.80	400.00
Huddleston, D.	2/09/23	Confer with team re case status and strategy.	.80	420.00
Poz, N.	2/09/23	Revise draft of SRCS Elite stipulation and exhibits in support.	.90	315.00
Poz, N.	2/09/23	Confer with team re case status and next steps.	.80	280.00
Dougherty, J.	2/09/23	Continue reviewing case law re relevant issues in adversary proceeding (2.4); update draft memorandum re same (1.2); confer with team re litigation status and strategy (0.8).	4.40	3,630.00
Rubinstein, J.	2/10/23	Review correspondence from insurers to Debtors re production of underlying discovery materials (0.2); review correspondence re policy stipulations (0.2).	.40	400.00
Martinez, S.	2/10/23	Review production databases re underlying claims.	.50	175.00
Gaske, A.	2/10/23	Communicate with SRCS Elite re revised policy stipulation.	.60	435.00
Gaske, A.	2/10/23	Analyze plan structure.	.20	145.00
Leveridge, R.	2/10/23	Confer with A. Kramer re litigation strategy.	.60	960.00
Leveridge, R.	2/10/23	Review discovery-related communications with co-counsel and opposing counsel.	.30	480.00
Ogrey, S.	2/10/23	Review and organize Liberty proposed stipulated policies.	.30	79.50
Ogrey, S.	2/10/23	Review productions for materials produced with complaints.	.50	132.50
Turner, C.	2/10/23	Continue to review and organize complaints against Debtors.	3.70	832.50



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Name	Date	Services	Hours	Amount
Hubbard, B.	2/10/23	Review complaint analysis.	.80	400.00
Poz, N.	2/10/23	Finalize execution copy of SRCS Elite stipulation with exhibits.	.40	140.00
Poz, N.	2/10/23	Organize letters from insurers re plaintiffs' production of third-party documents and complaints.	.10	35.00
Dougherty, J.	2/10/23	Continue reviewing recent rulings re issues relevant to adversary proceeding (2.0); continue revising draft memorandum re same (1.3).	3.30	2,722.50
Shore, R.	2/13/23	Confer with R. Leveridge and J. Rubinstein re strategy.	1.00	1,600.00
Shore, R.	2/13/23	Review standing stipulation (0.6); review communications from Consulting Expert A and R. Leveridge re analysis (0.6); analyze research re Issue #68 (1.0); review Insurer #2 documents re Issue #69 (0.5); review Insurer #12 settlement agreement (0.6); review correspondence re discovery issues (0.1); review correspondence re drafting history re Issue #66 (0.1).	3.50	5,600.00
Rubinstein, J.	2/13/23	Confer with R. Leveridge and R. Shore re strategy (1.0); analysis re legal research related to Issue #68 (1.4); correspond with Debtors' counsel re preparation for Deponent #19 deposition (0.2); correspond with co-counsel re defensive deposition scheduling (0.2); analysis re Consulting Expert A project (0.5); review status of offensive fact discovery (0.4); analysis re order for joint standing (0.4); correspond with team re analysis of documents (0.8).	4.90	4,900.00
Rush, M.	2/13/23	Communicate with team re depositions of insurer witnesses.	1.20	990.00
Martinez, S.	2/13/23	Finalize review of underlying complaints.	2.90	1,015.00
Martinez, S.	2/13/23	Review and organize materials re Issue #69.	.70	245.00
Gaske, A.	2/13/23	Continue analysis of plan structure (3.1); revise draft settlement for Insurer #12 (0.5).	3.60	2,610.00
Gaske, A.	2/13/23	Analyze documents in preparation for deposition of Deponent #5.	1.60	1,160.00
Gaske, A.	2/13/23	Review prior correspondence re outstanding potential Rule 30(b)(1) deponents (0.4); correspond with counsel for Insurer #33 re same (0.3).	.70	507.50
Leveridge, R.	2/13/23	Confer with R. Shore and J. Rubinstein re call with co-counsel, strategic issues, and expert work.	1.00	1,600.00
Leveridge, R.	2/13/23	Review stipulation and agreed order granting committees standing with Debtors re insurance claims.	.60	960.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	2/13/23	Communicate with Consulting Expert A re analysis (0.4); review material supplied by Consulting Expert A (1.2).	1.60	2,560.00
Leveridge, R.	2/13/23	Communicate with R. Shore, J. Rubinstein, and S. Sraders re Issue #69.	.40	640.00
Leveridge, R.	2/13/23	Review communications with co-counsel re Issue #69.	.40	640.00
Leveridge, R.	2/13/23	Review communications with Debtors and UCC counsel re depositions of Debtors' personnel (0.3); review status of offensive discovery (0.4).	.70	1,120.00
Leveridge, R.	2/13/23	Analysis of Issue #69.	.60	960.00
Sraders, S.	2/13/23	Analyze status and strategy of ongoing depositions.	.70	507.50
Sraders, S.	2/13/23	Correspond with counsel for Insurers #5 and #36 re potential deponents.	.20	145.00
Sraders, S.	2/13/23	Research re Issue #68.	1.20	870.00
Turner, C.	2/13/23	Finalize review and organization of complaints against Debtors.	2.50	562.50
Hubbard, B.	2/13/23	Research re underlying complaint materials.	2.20	1,100.00
Hubbard, B.	2/13/23	Review status of complaint documentation review.	.20	100.00
Poz, N.	2/13/23	Research Insurer #2 filings.	.90	315.00
Dougherty, J.	2/13/23	Continue reviewing recent ruling and case law re issues raised in adversary proceeding (1.9); revise memorandum re same (1.7).	3.60	2,970.00
Shore, R.	2/14/23	Analyze Issue #68 (0.5); confer with S. Sraders re same (0.4).	.90	1,440.00
Shore, R.	2/14/23	Review standing stipulation re Issue #69 (0.8); communicate with R. Leveridge and J. Rubinstein re same (0.3); review Insurer #2 materials (0.6).	1.70	2,720.00
Rubinstein, J.	2/14/23	Review correspondence with Consulting Expert A re status (0.1); review status of discovery and upcoming depositions (0.2); communicate with R. Shore and R. Leveridge re strategy (0.3); correspond with insurers re location of specific deponents (0.2); confer with J. Dougherty re research re specific policy provisions (0.3); review Insurer #2 documents re Issue #69 (0.5); review defendant correspondence re Debtors' privilege log entries (0.2).	1.80	1,800.00
Rush, M.	2/14/23	Communicate with B. Hubbard re Debtors' document production.	.20	165.00
Martinez, S.	2/14/23	Review and organize Insurer #2 materials.	.30	105.00
Martinez, S.	2/14/23	Finalize review of underlying complaint analysis.	.80	280.00
Gaske, A.	2/14/23	Draft deposition outline for Deponent #4.	1.30	942.50

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Name	Date	Services	Hours	Amount
Gaske, A.	2/14/23	Review exhibits for Liberty policy stipulation.	1.00	725.00
Leveridge, R.	2/14/23	Communicate with Consulting Expert A re status of analysis.	.60	960.00
Leveridge, R.	2/14/23	Communicate with J. Rubinstein, A. Gaske, S. Sraders, and M. Rush re offensive discovery issues.	.40	640.00
Leveridge, R.	2/14/23	Review letter from opposing counsel re challenge to Debtors' privilege logs.	.60	960.00
Sraders, S.	2/14/23	Confer with R. Shore re research re Issue #68.	.40	290.00
Sraders, S.	2/14/23	Research re Issue #68.	2.90	2,102.50
Hubbard, B.	2/14/23	Analyze results of complaint documentation review.	.80	400.00
Huddleston, D.	2/14/23	Confer with J. Dougherty re review of drafting history documents.	.50	262.50
Dougherty, J.	2/14/23	Confer with J. Rubinstein re review of drafting history materials (0.3); confer with D. Huddleston re same (0.5).	.80	660.00
Dougherty, J.	2/14/23	Continue analyzing recent rulings and case law re relevant issues in adversary proceeding (1.8); revise memorandum re same (1.1).	2.90	2,392.50
Shore, R.	2/15/23	Communicate with R. Leveridge and J. Rubinstein re standing stipulation.	.30	480.00
Rubinstein, J.	2/15/23	Confer with team re offensive discovery (0.8); confer with R. Leveridge and S. Sraders re Consulting Expert A analysis and next steps (0.3); analysis re retention of Potential Expert F (0.5); communicate with co-counsel re Insurer #25 discovery issues (0.2); correspond with team re analysis of documents relevant to Issue #27 (0.2).	2.00	2,000.00
Rush, M.	2/15/23	Confer with J. Rubinstein, R. Leveridge, A. Gaske, and S. Sraders re depositions	.80	660.00
Gaske, A.	2/15/23	Confer with J. Rubinstein, R. Leveridge, M. Rush, and S. Sraders re outstanding Rule 30(b)(1) witnesses and case strategy.	.80	580.00
Gaske, A.	2/15/23	Review background research re potential Rule 30(b)(1) deponent.	.20	145.00
Leveridge, R.	2/15/23	Confer with J. Rubinstein, M. Rush, A. Gaske, and S. Sraders re offensive discovery status.	.80	1,280.00
Leveridge, R.	2/15/23	Confer with J. Rubinstein and S. Sraders re status of expert work.	.30	480.00
Leveridge, R.	2/15/23	Confer with counsel for Potential Expert F and S. Sraders re expert work.	.70	1,120.00
Leveridge, R.	2/15/23	Communicate with R. Shore and J. Rubinstein re standing stipulation.	.30	480.00

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Name	Date	Services	Hours	Amount
Sraders, S.	2/15/23	Confer with J. Rubinstein and R. Leveridge re Consulting Expert A analysis.	.30	217.50
Sraders, S.	2/15/23	Confer with R. Leveridge, J. Rubinstein, M. Rush, and A. Gaske re strategy for upcoming depositions.	.80	580.00
Sraders, S.	2/15/23	Analysis re Potential Expert F potential retention.	.70	507.50
Sraders, S.	2/15/23	Correspond with J. Rubinstein and R. Leveridge re Potential Expert F.	.40	290.00
Sraders, S.	2/15/23	Research re Issue #68.	5.00	3,625.00
Hubbard, B.	2/15/23	Document results of complaint documentation review.	1.40	700.00
Huddleston, D.	2/15/23	Begin reviewing drafting history documents re Issue #66.	2.30	1,207.50
Dougherty, J.	2/15/23	Review documents identified for potential relevance re drafting history evidence (1.4); provide comments re updating search terms for documents re drafting history evidence (0.5).	1.90	1,567.50
Shore, R.	2/16/23	Communicate with J. Rubinstein and R. Leveridge re strategy.	.20	320.00
Shore, R.	2/16/23	Participate in call with co-counsel, R. Leveridge, and J. Rubinstein re strategy issues.	1.20	1,920.00
Shore, R.	2/16/23	Communicate with R. Leveridge and J. Rubinstein re co-counsel call.	.30	480.00
Rubinstein, J.	2/16/23	Review agenda for call with co-counsel (0.1); confer with co-counsel re strategy (1.5); correspond with team re Potential Expert F (0.1); review legal research re Issue #68 (0.3); communicate with team re underlying claim files (0.3); confer with R. Leveridge re litigation strategy (0.3); analysis re Issue #69 (0.2).	2.80	2,800.00
Gaske, A.	2/16/23	Revise outline for Deponent #4.	3.50	2,537.50
Leveridge, R.	2/16/23	Review litigation status and strategy (0.3); communicate with R. Shore and J. Rubinstein re same (0.2); communicate with co-counsel re same (0.2); participate in call with co-counsel, R. Shore, and J. Rubinstein re litigation issues and strategy (1.2); follow up communication with R. Shore and J. Rubinstein re same (0.3).	2.20	3,520.00
Huddleston, D.	2/16/23	Confer with J. Dougherty re search for drafting history documents re Issue #66.	.70	367.50
Huddleston, D.	2/16/23	Continue analyzing drafting history documents re Issue #66.	4.40	2,310.00
Dougherty, J.	2/16/23	Confer with D. Huddleston re refining research to identify potentially relevant drafting history materials re Issue #66.	.70	577.50

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Name	Date	Services	Hours	Amount
Dougherty, J.	2/16/23	Review cases cited in memorandum tracking legal issues relevant to adversary proceeding (2.2); revise memorandum re same (0.9).	3.10	2,557.50
Rubinstein, J.	2/17/23	Correspond with co-counsel re Issue #69 (0.1); confer with L. Szymanski and M. Rush re Insurer #25 discovery issues (1.2); analysis re drafting history (0.2).	1.50	1,500.00
Rush, M.	2/17/23	Confer with L. Szymanski and J. Rubinstein re discovery issues.	1.20	990.00
Gaske, A.	2/17/23	Review policy stipulation exhibits.	.40	290.00
Gaske, A.	2/17/23	Draft deposition outline for Deponent #4.	3.80	2,755.00
Leveridge, R.	2/17/23	Confer with counsel re Issue #69.	.60	960.00
Leveridge, R.	2/17/23	Communicate with Consulting Expert A re project status.	.30	480.00
Leveridge, R.	2/17/23	Communicate with potential expert re protective order issues.	.30	480.00
Leveridge, R.	2/17/23	Communicate with J. Rubinstein re discussion with Debtors' counsel re status of review of material produced by Insurer #25.	.30	480.00
Ogrey, S.	2/17/23	Prepare exhibits for Liberty policy stipulation.	.20	53.00
Huddleston, D.	2/17/23	Research re insurer deposition witnesses.	.60	315.00
Huddleston, D.	2/17/23	Continue analyzing drafting history documents re Issue #66.	.30	157.50
Poz, N.	2/17/23	Create master tracking of exhibits used at depositions.	2.30	805.00
Poz, N.	2/17/23	Review potential expert acknowledgement and agreement to be bound by protective order.	.10	35.00
Dougherty, J.	2/17/23	Review status of research for potentially relevant drafting history re Issue #66.	.80	660.00
Dougherty, J.	2/17/23	Continue reviewing case law cited in memorandum tracking legal issues relevant to adversary proceeding (1.1); revise memorandum re same (0.7).	1.80	1,485.00
Shore, R.	2/20/23	Review and revise memorandum re Issue #52.	1.60	2,560.00
Rubinstein, J.	2/20/23	Revise draft outline for deposition of Deponent #4 (2.6); review Issue #52 memorandum from A. Gaske and S. Sraders (0.4).	3.00	3,000.00
Shore, R.	2/21/23	Review S. Sraders memorandum re Issue #63.	.90	1,440.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	2/21/23	Review correspondence with insurer counsel re policy stipulation status (0.1); review correspondence with counsel for Insurers #18, #19, and #20 re deposition scheduling (0.1); review deposition transcript of Deponent #18 (2.9); correspond with A. Gaske re deposition outlines (0.2); review draft discovery letter to insurers re Debtors' privilege logs and correspondence re same (0.2)	3.50	3,500.00
Rush, M.	2/21/23	Review documents in preparation for depositions of Insurers #18, #19, and #20 deponents.	.80	660.00
Gaske, A.	2/21/23	Confer with potential Rule 30(b)(1) deponent (0.1); draft summary of call with potential deponent (0.4).	.50	362.50
Gaske, A.	2/21/23	Revise deposition outline for Deponent #4 pursuant to J. Rubinstein edits.	4.30	3,117.50
Gaske, A.	2/21/23	Revise exhibits in preparation for deposition of Deponent #4.	1.50	1,087.50
Gaske, A.	2/21/23	Correspond with co-counsel re deposition outline for Deponent #4.	.30	217.50
Leveridge, R.	2/21/23	Communicate with M. Rush and J. Rubinstein re discovery communication to Liberty.	.20	320.00
Leveridge, R.	2/21/23	Review and provide comments re deposition outline for Deponent #4.	1.10	1,760.00
Leveridge, R.	2/21/23	Review communications between R. Shore and J. Rubinstein re Issue #52 strategy.	.40	640.00
Leveridge, R.	2/21/23	Review draft letter from Debtors' counsel to opposing counsel re privilege logs (0.3); review communications among co-counsel re same (0.1).	.40	640.00
Leveridge, R.	2/21/23	Analysis of adversary proceeding status.	.30	480.00
Leveridge, R.	2/21/23	Analysis of Issue #69.	.20	320.00
Huddleston, D.	2/21/23	Continue researching drafting history documents re Issue #66.	.60	315.00
Poz, N.	2/21/23	Review and organize co-plaintiffs' 46th production.	.40	140.00
Poz, N.	2/21/23	Continue revising master tracking of exhibits used at depositions.	1.70	595.00
Dougherty, J.	2/21/23	Review drafting history materials identified as potentially relevant re Issue #66 (1.6); continue review of case law cited in memorandum tracking relevant legal issues in adversary proceeding (2.5).	4.10	3,382.50
Shore, R.	2/22/23	Communicate with J. Rubinstein and R. Leveridge re strategy.	.50	800.00
Shore, R.	2/22/23	Confer with R. Leveridge, J. Rubinstein and S. Sradars re Issue #68.	.80	1,280.00

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Name	Date	Services	Hours	Amount
Shore, R.	2/22/23	Analysis re settlement strategy.	.70	1,120.00
Rubinstein, J.	2/22/23	Revise Deponent #4 deposition outline (2.5); communicate with J. Dougherty re drafting history evidence (0.2); communicate with R. Shore and R. Leveridge re strategy (0.5); review M. Leopold claim acknowledgement (0.1); review correspondence re discovery status and issues (0.5); confer with R. Shore, R. Leveridge and S. Sraders re analysis of Issue #68 (0.8); update litigation task list (0.6).	5.20	5,200.00
Gaske, A.	2/22/23	Draft deposition outline for Deponent #5.	4.40	3,190.00
Gaske, A.	2/22/23	Review edits from J. Rubinstein re deposition outline for Deponent #4.	.40	290.00
Leveridge, R.	2/22/23	Communicate with R. Shore and J. Rubinstein re strategy.	.60	960.00
Leveridge, R.	2/22/23	Analysis re Issue #69.	.70	1,120.00
Leveridge, R.	2/22/23	Confer with R. Shore, J. Rubinstein and S. Sraders re research re Issue #68.	.80	1,280.00
Leveridge, R.	2/22/23	Communicate with B. Hubbard re claims analysis.	.30	480.00
Leveridge, R.	2/22/23	Review status of upcoming depositions.	.40	640.00
Leveridge, R.	2/22/23	Review communication from Debtors' counsel re upcoming deposition.	.20	320.00
Ogrey, S.	2/22/23	Review and organize Liberty proposed stipulated policies.	2.20	583.00
Sraders, S.	2/22/23	Confer with R. Leveridge, R. Shore, and J. Rubinstein re research re Issue #68.	.80	580.00
Sraders, S.	2/22/23	Review research re Issue #68.	.20	145.00
Sraders, S.	2/22/23	Revise draft memorandum re Issue #68.	3.30	2,392.50
Turner, C.	2/22/23	Review and organize Liberty proposed stipulated policies.	.20	45.00
Turner, C.	2/22/23	Review and organize Deponent #5 deposition exhibits.	.50	112.50
Huddleston, D.	2/22/23	Continue reviewing drafting history documents re Issue #66.	4.00	2,100.00
Poz, N.	2/22/23	Review acknowledgement of claim re M. Leopold.	.20	70.00
Poz, N.	2/22/23	Continue updating master tracking spreadsheet re exhibits used at depositions.	1.70	595.00
Poz, N.	2/22/23	Organize co-plaintiffs' February 22, 2023 supplemental production.	.40	140.00
Poz, N.	2/22/23	Review and organize relevant materials for Deponents #4 and #5 depositions.	1.50	525.00

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Name	Date	Services	Hours	Amount
Dougherty, J.	2/22/23	Continue reviewing drafting history materials identified as potentially relevant re Issue #66 (1.3); continue reviewing case law cited in memorandum tracking relevant legal issues (2.6).	3.90	3,217.50
Shore, R.	2/23/23	Communicate with R. Leveridge and J. Rubinstein re Issue #68.	.70	1,120.00
Shore, R.	2/23/23	Correspond with A. Gaske re review of agreement with Insurer #12.	.20	320.00
Shore, R.	2/23/23	Confer with plaintiffs' counsel re Issue #69 and broader litigation strategy.	1.20	1,920.00
Shore, R.	2/23/23	Confer with team re status, strategy, and next steps.	.70	1,120.00
Rubinstein, J.	2/23/23	Analysis re litigation strategy (0.5); review and provide comments on memorandum re Issue #68 (0.7); review insurer correspondence re Debtors' privilege logs (0.1); communicate with J. Dougherty re drafting history analysis (0.2); confer with M. Rush re discovery issues (0.4); confer with team re strategy and open tasks (0.7); confer with co-plaintiff counsel re strategy (0.9); analysis re Issue #69 (0.3).	3.80	3,800.00
Rush, M.	2/23/23	Confer with team re case status and strategy.	.70	577.50
Rush, M.	2/23/23	Confer with J. Rubinstein re discovery issues.	.40	330.00
Martinez, S.	2/23/23	Confer with team re case status and strategy.	.70	245.00
Gaske, A.	2/23/23	Confer with team re strategy and next steps.	.70	507.50
Gaske, A.	2/23/23	Correspond with R. Shore re agreement with Insurer #12.	.20	145.00
Gaske, A.	2/23/23	Review revisions to draft Liberty policy stipulation.	.50	362.50
Leveridge, R.	2/23/23	Communicate with R. Shore and J. Rubinstein re Issue #69.	.70	1,120.00
Leveridge, R.	2/23/23	Communicate with Consulting Expert A re status of project.	.30	480.00
Leveridge, R.	2/23/23	Confer with co-counsel re strategy issues.	1.20	1,920.00
Leveridge, R.	2/23/23	Confer with team re case status and next steps (0.7); review status of various litigation / discovery projects (0.5).	1.20	1,920.00
Leveridge, R.	2/23/23	Review communication from B. Hubbard re status of claims analysis.	.20	320.00
Farra, A.	2/23/23	Confer with team re litigation update.	.70	542.50
Sraders, S.	2/23/23	Confer with team re litigation update and strategy.	.70	507.50
Sraders, S.	2/23/23	Revise draft memorandum re Issue #68.	3.80	2,755.00
Turner, C.	2/23/23	Continue to review and organize Liberty policy stipulation exhibits.	2.70	607.50



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Name	Date	Services	Hours	Amount
Turner, C.	2/23/23	Confer with team re strategy and case update.	.70	157.50
Hubbard, B.	2/23/23	Confer with team re status and strategy.	.70	350.00
Huddleston, D.	2/23/23	Continue reviewing drafting history documents re Issue #66.	4.40	2,310.00
Huddleston, D.	2/23/23	Confer with team re case status and strategy.	.70	367.50
Poz, N.	2/23/23	Review potential exhibits for Deponent #4 deposition.	1.40	490.00
Poz, N.	2/23/23	Revise tracking spreadsheet re Deponents #3 and #14 deposition transcripts and exhibits.	.40	140.00
Poz, N.	2/23/23	Continue updating tracking spreadsheet of exhibits used at depositions.	.30	105.00
Poz, N.	2/23/23	Confer with team re case status and next steps.	.70	245.00
Dougherty, J.	2/23/23	Confer with team re litigation status and next steps (0.7); continue review of drafting history materials re Issue #66 (1.7).	2.40	1,980.00
Shore, R.	2/24/23	Communicate with R. Leveridge re Issue #69.	.60	960.00
Shore, R.	2/24/23	Communicate with R. Leveridge, J. Rubinstein, and S. Sraders re Issue #68.	.20	320.00
Shore, R.	2/24/23	Draft correspondence re Issue #69.	.30	480.00
Shore, R.	2/24/23	Confer with co-counsel re Issue #69.	.50	800.00
Rubinstein, J.	2/24/23	Revise correspondence re Issue #69 (1.3); revise draft Deponent #5 deposition outline (2.5); communicate with team re Potential Expert E (0.2); correspond with team re Issue #68 (0.4); review supplemental production correspondence from Navigators (0.1).	4.50	4,500.00
Rush, M.	2/24/23	Review documents produced by Skadden.	.60	495.00
Gaske, A.	2/24/23	Revise potential exhibits for Deponent #4 deposition (0.6); revise potential exhibits for Deponent #5 deposition (0.8).	1.40	1,015.00
Gaske, A.	2/24/23	Correspond with counsel for Aspen and SRCS Elite re policy stipulations.	.10	72.50
Gaske, A.	2/24/23	Revise portion of deposition outline for Deponent #5 pursuant to J. Rubinstein comments.	1.20	870.00
Leveridge, R.	2/24/23	Communicate with co-counsel re Issue #69.	1.70	2,720.00
Leveridge, R.	2/24/23	Review memorandum from S. Sraders re Issue #68 (0.7); communicate with R. Shore, J. Rubinstein and S. Sraders re same (0.2).	.90	1,440.00
Leveridge, R.	2/24/23	Review communication from potential expert.	.30	480.00
Sraders, S.	2/24/23	Revise memorandum re Issue #68.	2.40	1,740.00
Sraders, S.	2/24/23	Confer with Potential Expert E re proposal.	.10	72.50

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Name	Date	Services	Hours	Amount
Turner, C.	2/24/23	Review and organize exhibits for Deponent #15 deposition.	.40	90.00
Turner, C.	2/24/23	Continue to review and organize complaints against Debtors.	1.20	270.00
Turner, C.	2/24/23	Finalize review and organization of Liberty policies.	1.20	270.00
Huddleston, D.	2/24/23	Continue reviewing drafting history documents re Issue #66.	1.90	997.50
Poz, N.	2/24/23	Continue reviewing and organizing exhibits for Deponents #4 and #5 depositions.	2.60	910.00
Dougherty, J.	2/24/23	Review drafting history materials identified as potentially relevant re Issue #66.	.90	742.50
Gaske, A.	2/25/23	Continue revising deposition outline for Deponent #5.	1.40	1,015.00
Shore, R.	2/27/23	Confer with R. Leveridge and J. Rubinstein re status, strategy, and next steps.	.60	960.00
Shore, R.	2/27/23	Review and revise memorandum on Issue #68.	3.90	6,240.00
Shore, R.	2/27/23	Review memorandum on Issue #45.	.30	480.00
Rubinstein, J.	2/27/23	Communicate with R. Leveridge and R. Shore re strategy (0.7); communications re Issue #69 (0.2); review deposition outline and materials in preparation for deposition of Deponent #19 (1.0); review revised memorandum re Issue #68 (1.0); correspond with A. Gaske re Deponent #19 deposition (0.2); review revised draft note re Issue #27 (0.2); analysis re production of documents from Skadden possession (0.2).	3.50	3,500.00
Gaske, A.	2/27/23	Revise deposition outline for Deponent #4 pursuant to J. Rubinstein edits.	1.20	870.00
Gaske, A.	2/27/23	Draft summary of research re Issue #45.	3.00	2,175.00
Leveridge, R.	2/27/23	Confer with R. Shore and J. Rubinstein re status of outstanding matters.	.60	960.00
Leveridge, R.	2/27/23	Factual investigation re Issue #69.	.20	320.00
Leveridge, R.	2/27/23	Review memorandum and other supporting material from Debtors' counsel re Issue #69.	.60	960.00
Sraders, S.	2/27/23	Confer with R. Shore re memorandum re Issue #68.	.20	145.00
Sraders, S.	2/27/23	Analyze potential Insurer #5 Rule 30(b)(1) deponents.	.70	507.50
Turner, C.	2/27/23	Review and organize Deponent #5 deposition exhibits.	1.50	337.50
Turner, C.	2/27/23	Continue reviewing and organizing underlying complaints.	1.50	337.50

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Name	Date	Services	Hours	Amount
Huddleston, D.	2/27/23	Communicate with M. Rush and J. Dougherty re researching drafting history documents re Issue #66.	.10	52.50
Poz, N.	2/27/23	Organize Insurer #25 supplemental production, privilege and redaction logs.	.80	280.00
Poz, N.	2/27/23	Research additional potential materials for Deponents #4 and #5 depositions.	.50	175.00
Dougherty, J.	2/27/23	Continue reviewing drafting history materials identified for second-level review re Issue #66 (1.7); communicate with D. Huddleston re review of additional materials (0.6).	2.30	1,897.50
Shore, R.	2/28/23	Further revisions to memorandum re Issue #68 (1.3); communicate with S. Sraders re additional issue re same (0.2); communicate with S. Sraders and J. Rubinstein re memorandum (0.2).	1.70	2,720.00
Shore, R.	2/28/23	Confer with R. Leveridge re litigation strategy.	.40	640.00
Rubinstein, J.	2/28/23	Correspond with team re multiple strategic memoranda (0.7); review materials in preparation for Deponents #4 and #5 depositions (1.2); communicate with co-counsel re Issue #69 (0.4); review communications re discovery correspondence (0.4); communicate with R. Leveridge re strategy and status of various tasks (0.3); participate in meet-and-confer call with insurer counsel and co-counsel re privilege logs (0.9).	3.90	3,900.00
Gaske, A.	2/28/23	Communicate with co-counsel re Issue #45.	.30	217.50
Gaske, A.	2/28/23	Revise deposition outlines for Deponents #4 and #5.	1.10	797.50
Gaske, A.	2/28/23	Review materials in preparation for deposition of Deponent #4.	2.60	1,885.00
Leveridge, R.	2/28/23	Confer with R. Shore re litigation strategy.	.40	640.00
Leveridge, R.	2/28/23	Review legal memorandum re Issue #69 (0.6); communicate with team re same (0.2); communicate with co-counsel re same (0.1).	.90	1,440.00
Leveridge, R.	2/28/23	Communicate with co-counsel re Issue #69 (0.6); communicate with R. Shore and J. Rubinstein re same (0.3).	.90	1,440.00
Leveridge, R.	2/28/23	Review legal analysis re Issue #45 (0.4); communicate with J. Rubinstein and A. Gaske re same (0.3); review communications with co-counsel re same (0.2).	.90	1,440.00
Sraders, S.	2/28/23	Revise and finalize memorandum re Issue #68.	4.20	3,045.00

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Name	Date	Services	Hours	Amount
Sraders, S.	2/28/23	Analyze potential additional deponents for Insurer #24.	.40	290.00
Hubbard, B.	2/28/23	Review results of new document production.	1.60	800.00
Huddleston, D.	2/28/23	Continue reviewing drafting history documents re Issue #66.	2.00	1,050.00
Poz, N.	2/28/23	Revise exhibits for Deponent #4 deposition.	.70	245.00
Dougherty, J.	2/28/23	Continue review of drafting history materials identified for second-level review re Issue #66.	1.10	907.50
Project Total:			485.10	\$ 414,262.50

**TOTAL CHARGEABLE HOURS**

**495.30**

**TOTAL FEES**

**\$ 422,883.75**

**TIMEKEEPER SUMMARY**

Timekeeper	Hours	Rate	Total
Gilbert, S.	3.50	1,950.00	6,825.00
Shore, R.	34.10	1,600.00	54,560.00
Rubinstein, J.	68.80	1,000.00	68,800.00
Rush, M.	21.60	825.00	17,820.00
Martinez, S.	14.10	350.00	4,935.00
Gaske, A.	2.10	362.50	761.25
Gaske, A.	57.40	725.00	41,615.00
Leveridge, R.	59.00	1,600.00	94,400.00
Ogrey, S.	12.50	265.00	3,312.50
Farra, A.	7.60	775.00	5,890.00
Sraders, S.	45.40	725.00	32,915.00
Turner, C.	39.10	225.00	8,797.50
Hubbard, B.	20.00	500.00	10,000.00
Huddleston, D.	29.00	525.00	15,225.00
Poz, N.	20.80	350.00	7,280.00
Dougherty, J.	60.30	825.00	49,747.50
<b>TOTALS</b>	<b>495.30</b>		<b>\$ 422,883.75</b>

**TASK SUMMARY**

Task	Description	Hours	Amount
A004	Case Administration	4.60	1,035.00
A009	Meetings / Communications with AHC	3.50	6,825.00
A015	Non-Working Travel (Billed @ 50%)	2.10	761.25
A020	Insurance Adversary Proceeding	485.10	414,262.50

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## EXPENSE DETAILS

### E110: Out-of-Town Travel

Date	Description	Task	Amount
10/26/22	Travel - Train Fare / Richard Shore / Washington, DC to New York NY (Roundtrip / Business Class) / Attend strategic planning meeting with co-counsel / 10.24-26.2022	E110	640.00
10/26/22	Travel - Lodging / Richard Shore / New York NY / Attend strategic planning meeting with co-counsel / 10.24-26.2022 (2 nights)	E110	1,000.00
10/26/22	Travel - Meals / Richard Shore / New York NY / Attend strategic planning meeting with co-counsel / Dinner with P. Breene, A. Kramer, J. Patten (coverage counsel for Purdue) and R. Leveridge / 10.24.2022	E110	250.00
<b>Sub-Total of Expenses:</b>			<b>\$ 1,890.00</b>

### E115: Deposition Transcripts

Date	Description	Task	Amount
1/12/23	Deposition/Transcript / Veritext / Deposition Transcript	E115	1,658.25
2/07/23	Deposition/Transcript / Veritext / Deposition Transcript	E115	933.00
<b>Sub-Total of Expenses:</b>			<b>\$ 2,591.25</b>

### E118: Litigation Support Vendors

Date	Description	Task	Amount
12/31/22	Contracted Professional Services / Cobra Legal Solutions LLC / User License and Hosting / 2022.12	E118	913.75
1/31/23	Contracted Professional Services / Cobra Legal Solutoins LLC / User License/ Hosting / 2023.01	E118	859.75
<b>Sub-Total of Expenses:</b>			<b>\$ 1,773.50</b>

**TOTAL EXPENSES** **\$ 6,254.75**

**TOTAL FEES AND EXPENSES** **\$ 429,138.50**